

MENKEN SIMPSON & ROZGER LLP

80 PINE STREET, 33RD FLOOR
NEW YORK, NEW YORK 10005

TELEPHONE: (212) 509-1616

FACSIMILE: (212) 509-8088

WWW.NYEMPLOYEEELAW.COM

BRUCE E. MENKEN
SCOTT SIMPSON
JASON J. ROZGER ^Δ
BRENNAN RABINOWITZ
RAYA F. SAKSOUK

^Δ ALSO ADMITTED NJ

ALAN SERRINS
OF COUNSEL

March 8, 2024

Via ECF

Hon. Lee G. Dunst, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Agudelo v. Recovco Mortgage Management LLC et al.*, No. 22 Civ. 4004
Joint Status Report

Dear Judge Dunst:

The parties write pursuant to the Court's February 13, 2024, Order to submit a Joint Status Report on March 8, 2024.

The parties, with the exception of Michael Strauss and Recovco Mortgage Management LLC ("Recovco"), neither of whom participated in our correspondence, respectfully request an opportunity to update the Court on or before March 13, 2024. Recovco is required to retain counsel by March 8, which is also the deadline for Strauss to retain counsel. *See* Text Order of January 8, 2024. In light of this, the parties would like to wait and see if counsel appears for Recovco and/or Strauss, as that will affect how the parties proceed and any proposed plan for upcoming motions and discovery.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Scott Simpson
Scott Simpson